

Exhibit K

Wright Expert Report

PRISON LEGAL NEWS

Dedicated to Protecting Human Rights

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June 6, 2007

Scott Medlock
Texas Civil Rights Project
1405 Montopolis Dr.
Austin, TX 78741

RE: *Prison Legal News v. Lindsey*

Dear Mr. Medlock,

I have completed my initial assessment of the Dallas County Jail's publications and mail policy which banned all publications sent to its prisoners.

My education and professional background are described in more detail in the attached resume. I have not served as an expert witness in the previous four years in any case.

The documents I reviewed in preparation for my testimony in this case are:

- 1) Complaint, *Prison Legal News v. Lindsey*.
- 2) Grievance response of July 20, 2006, to Billy Allen.
- 3) Correspondence from Billy Allen and LaKeith Shariff to PLN.
- 4) Dallas County Jail Publication Policy.
- 5) Dallas County Jail Inmate Handbook.

Prison Legal News is a monthly magazine which reports news and legal information on all aspects of the criminal justice system, especially its detention facilities. It is aimed at educating prisoners and the public about the human and legal rights of prisoners and helping prisoners vindicate their legal rights in the civil justice system in a non violent manner.

The Dallas Jail policy banning all newspapers, magazines and publications from being sent to prisoners in its custody is a seriously exaggerated response to the claimed security concerns. PLN has subscribers in all fifty state prison systems as well as the federal Bureau of Prisons and none of those facilities ban publications and newspapers.

Instead, the cited concerns of the Dallas Jail (reducing fire hazards, allowing for easier cell searches and reducing places to conceal contraband) are met and dealt with by other, more effective policies which do not violate the free speech rights of publishers or

prisoners. This includes policies limiting the amount of publications prisoners may retain in their possession at any given time, providing a storage space for publications, etc. Concerns about contraband being concealed inside publications sent to prisoners are typically, and effectively, addressed by requiring that such publications be sent by the publisher or a vendor.

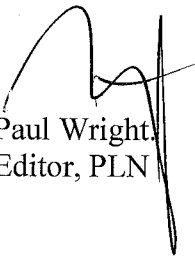
The Dallas Jail appears to be unique for a large metropolitan jail in its ban on all publications and not allowing prisoners to order and receive publications.

It is well established that allowing prisoners access to reading material, especially local and hometown newspapers and educational publications such as *Prison Legal News*, reduces recidivism and encourages respect for authority as well as the court system and allows prisoners to remain connected to their communities while imprisoned. A variety of publishers also seek to disseminate their publications and information to prisoners. This includes prison ministries, non profit organizations like Prison Legal News, daily newspapers, etc.

The staff resources necessary to inspect, process and deliver publications sent directly from the publisher or a vendor are minimal. Likewise, providing notice mail will not be delivered to the sender, including publications, is a minimal use of government resources and is a function provided by all state prison systems and the federal Bureau of Prisons when they censor items.

This is an initial report made from the documentary record as of June 6, 2007. Additional findings may be offered in supplemental reports as information becomes available.

Respectfully Submitted,



Paul Wright,
Editor, PLN